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WSC Sportfishing Rule Proposals – WDFW "Not Recommended" Comments

1) **Hoh River – No fishing from a floating device Feb 1 – Nov 30, Morgan's Crossing to ONP boundary**

WSC Original Proposal Justification:

This is an important spawning area for mid and late run wild steelhead in the Hoh River. Wild early run and South Fork steelhead rest and slowly pass though this area during the early winter months and spawn in upriver areas. By early March, later run steelhead have begun spawning in the area in good numbers, continuing throughout the spring. Boats can access every possible holding and spawning lie in the entire river, while bank anglers have less access to challenging lies. Wild steelhead are caught-and-released (CnR) in large numbers, often while in their spawning phase. Repeated and high levels of CnR can negatively influence behavior, reproduction, and survival of wild steelhead (Ashbrook 2010; Hooton, 2001; others). This proposal will provide a partial refuge, increasing chances for steelhead survival and effective spawning. Over time this regulation should increase wild steelhead abundance and diversity, improving their health and the fishery for future generations.

WDFW Comments:

Not Recommended for further consideration Reference ID: DFW181021

The "no fishing from a floating device" regulation to reduce negative effects of catch and release fisheries on wild steelhead is typically not a tool used to address conservation objectives. Currently wild steelhead are meeting escapement in this river. Limiting harvest of wild steelhead to one per year per angler statewide, to be taken only in the lower stretches of rivers that are routinely meeting escapement goals, has reduced the non-treaty harvest of wild steelhead in these rivers by roughly 70 percent. Upper reaches of the north coastal streams under both State and Olympic National Park jurisdiction require selective gear and some are closed during much of the year, further limiting impacts of catch and release fishing. WDFW welcomes discussion of this and other ideas to better manage the wild steelhead stocks of the North Coast, as escapements, and catch and effort trends continue to develop in the future.

WSC Rebuttal/Justification:

WDFW must find new methods to protect wild steelhead stocks from the declines we have seen statewide. Using the only metric- making escapement- applied to stocks in

Puget Sound and was in part responsible for the run failures. Using additional metrics as evaluating long term abundances and the changes in fishing effort will add considerable knowledge to conservation evaluations. In the case of the Hoh River, the abundance has fallen approximately 50 to 75% since the 1950s and 30% since the 1980s; this slide is slower than the one in Puget Sound but of similar significance.

In this proposal we have suggested a change that will keep people fishing full season while protecting both holding and spawning early and late run fish. The alternative in a few years may be a closure in these areas by late February that will greatly disrupt economies, guides and other float fishers alike. Making this change now can potentially stave off more radical changes in the near future.

2) **Sol Duc River – No fishing from a floating device Feb 1 – Nov 30, Sol Duc Hatchery to 101 bridge upstream of Klahowya Campground**

WSC Original Proposal Justification:

This is one of the most important spawning areas for early wild steelhead in the Sol Duc River (McMillan et.al. 2007). Virtually every piece of holding water and spawning riffle is now fished hard and repeatedly by anglers in boats and they catch-and-release (CnR) numerous steelhead during a single day (WDFW creel surveys). Heightened CnR has been shown to have negative consequences on the behavior, reproductive success and survival of many species including adult steelhead (Ashbrook 2010; Hooton 2001, others). This regulation will continue to allow ample sport fishing opportunity from the bank and establish a partial reserve for resting and holding steelhead. WDFW plans to designate this river as a Wild Steelhead Management Zone to protect steelhead genetics while allowing sport fishing. Reduced angling encounters will improve wild steelhead survival and spawning, help rebuild the early-timed run now depleted, and improve their range of genetic and adaptive diversity.

WDFW Comments:

Not Recommended for further consideration Reference ID: DFW986676

UPDATED: The "no fishing from a floating device" regulation to reduce negative effects of catch and release fisheries on wild steelhead is typically not a tool used to address conservation objectives. Currently wild steelhead are meeting escapement in this river. Limiting harvest of wild steelhead to one per year per angler statewide, to be taken only in the lower stretches of rivers that are routinely meeting escapement goals, has reduced the non-treaty harvest of wild steelhead in these rivers by roughly 70 percent. Upper reaches of the north coastal streams under both State and Olympic National Park

jurisdiction require selective gear and some are closed during much of the year, further limiting impacts of catch and release fishing. WDFW welcomes discussion of this and other ideas to better manage the wild steelhead stocks of the North Coast, as escapements, and catch and effort trends continue to develop in the future.

WSC Rebuttal/Justification:

In addition to our above comments on the Hoh River proposal, note that all coastal Olympic Rivers have experienced major declines. The Quillayute system upheld its abundance until recently when it showed its first major decline. Over the 10 year period following the late 1990s the stock abundance fell over 70%. Although abundance has partially recovered today, that recent decline shows the importance of further stock protection. Again, we predict that our suggestion to close one spawning and holding area for early and late run fish will stave off future declines of this magnitude and keep all tributaries, including the Sol Duc, open to fishing the full season. We also note that the Queets stock abundance has fallen from an average of about 10,000 fish in the late 1980s and early 1990s to about 6,000 fish today, a decline of 40%. The Quinault has fallen from about 8,000 fish during the same period to about 5,000 fish today, a 40% decline.

WDFW and sport fishers must recognize that these coastal rivers are the last region where stocks are making escapements and can remain open to sport fishing. Yet all the major coastal rivers show the same trend of declines of declining towards sub escapement goal levels and depletion in the near future. Making these reasonably minor changes now to protect spawners can help divert the trend of declines and keep these rivers open to fishing.

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3) Selective Gear Only – Feb 1 to April 30, West side rivers

WSC Original Proposal Justification:

Catch and release mortality can vary widely depending the gear type used. Hooten (2001) found that hooking mortality was consistently at least 3 to 9 times higher when using bait verses using artificial lure or fly. Bruesewitz (1995) found that the highest percentage (17. 8%) of critical area hookings (tongue, esophagus, gills, and eyes) occurred when using bait and treble hooks in winter steelhead fisheries. Because steelhead and stream-resident rainbow trout are the same species, inter-spawn, and both can produce anadromous forms, it is important to consider wild rainbow trout conservation when managing for wild steelhead sustainability and recovery. Many studies have shown significantly higher mortality in trout when angling with bait verses artificial lures/flies (Taylor and White 1992; Schill and Scarpella 1995; Mongillo 1984;

Wydoski 1977; Schisler and Bergersen 1996). Taylor and White (1992) showed an average mortality of trout to be 6-8 times greater when using bait verses using lures or flies, respectively. Selective gear rules are necessary to minimize the mortality impacts on wild steelhead populations (including many ESA listed stocks).

WDFW Comments:

Not Recommended for further consideration Reference ID: DFW725075

Disagree with the intent of year-round restrictions in eastern Washington, but only seasonal restrictions in western Washington, with no justification for the differences. We have some very strong evidence from ODFW regarding hook and line collection of steelhead in the Grande Ronde River by volunteers during the fall season over a period of years and then holding those fish for many months in a hatchery. The mortality from hook and release was very low.

WSC Rebuttal/Justification:

WDFW should review the published literature on subject which shows a significant loss of fish that are caught and released. The Oregon information has not been reported on in any papers we are familiar with and we would like to see it available by gear and hook type. Note that both the Hooton (2001) and Bruesewitz (1995) studies we reported on found the largest mortality associated with bait (as high as 17.8%), followed by gear and the lowest was with fly caught fish. Our proposal was to eliminate the use of bait and barbless hooks, neither of which you have mentioned from the Oregon work. On the other hand, the recent WDFW study in Puget Sound found a 14% mortality rate (Ashbrook, 2010). Clearly the elimination of bait and barbed hooks will greatly reduce CnR mortality on wild fish. Note also that British Columbia has eliminated bait and barbed hooks on the Skeena system for the reasons detailed above.

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4) Mandatory Hatchery Steelhead Retention - Statewide

WSC Original Proposal Justification:

Unharvested Puget Sound hatchery steelhead create a negative impact to wild steelhead populations when allowed to spawn in the wild. This is a critical conservation measure to reduce the overall impact of hatchery steelhead on wild steelhead populations through the required retention of hatchery fish. Hatchery steelhead stray far worse than wild steelhead and often spawn in rivers on non-origin. Hatchery steelhead have lost most of their productivity (Araki et.al. 2008) but do spawn with wild steelhead and reduce the overall

rivers production. Hatchery steelhead also spawn together and their fry compete with wild fry for food and space (Kostow 2009). The state steelhead management plan describes the need to increase the harvest rates on hatchery-origin fish. This regulation is already in place during steelhead fisheries in the upper Columbia and its tributaries that provide both angling opportunity while reducing impacts to recovering ESA listed steelhead.

WDFW Comments:

This proposal would restrict option for catch and release fishing and would be very hard to enforce.

WSC Rebuttal/Justification:

We recognize this rule cannot be perfectly enforced; however fisheries enforcement officers know the areas and times where fisheries take place for the hatchery fish and that there are only small numbers of wild fish at those areas and times. This rule proposal carries with it intent to save wild fish from introgression and ecological impacts that sport fishers will come to understand. The rule alone will stop most of the hatchery fish releases. Hence it will accomplish much of its purpose.